#### Message

From: Baranco, Angela [Baranco.Angela@epa.gov]

**Sent**: 4/3/2014 3:25:04 PM

To: Sakamoto, Glenn [Sakamoto.Glenn@epa.gov]

CC: Greenberg, Ken [Greenberg.Ken@epa.gov]; Morimoto, Kaoru [Morimoto.Kaoru@epa.gov]

Subject: RE: R9 Joint CAFO Inspections are EPA Lead. RE: Question regarding CAFO inspections reports

## Hi Glenn,

No worries. It's one of those ICIS reporting problems of having to report nearly the same data into too many data fields, one of which seems to ask for the other agency involved in the joint inspection, when in fact it assigns a value that indicates that agency as the lead.

You had correctly reported that these were federal EPA inspections, and that they were joint with the state. So the inspections did show up in the EPA reports. They just also showed up as state inspections due to that "S" flag.

From: Sakamoto, Glenn

Sent: Thursday, April 03, 2014 6:23 AM

To: Baranco, Angela

Cc: Greenberg, Ken; Morimoto, Kaoru

Subject: RE: R9 Joint CAFO Inspections are EPA Lead. RE: Question regarding CAFO inspections reports

# Hi Angela -

Thank you for making this correction. Not sure how they all turned out as State Lead. I recall entering my ICIS entries (for all of our joint CEIs with the State) as "EPA lead." In fact (FYI), I will be conducting 10 CEI inspections for FY14 during the week of April 14 (2014) in the North Coast Region (Regional Board 1). These are all ACS commitments with Headquarters and are all "EPA Lead" inspections. I "will" enter them into ICIS as such. Thanks again for your tracking updates and corrections to the FY13 entries.

Glenn

## Glenn H Sakamoto

Environmental Scientist Enforcement Division (ENF 3-1) US EPA, Region 9 75 Hawthorne Street San Francisco, CA 94105

W: (415) 972-3556 Fax: (415) 947-3549

E-mail: sakamoto.glenn@epa.gov

From: Baranco, Angela

Sent: Wednesday, April 02, 2014 4:06 PM

To: Sprague, David

Cc: Greenberg, Ken; Morimoto, Kaoru; Sakamoto, Glenn

Subject: R9 Joint CAFO Inspections are EPA Lead. RE: Question regarding CAFO inspections reports

Hi David,

Thanks for following up with us on these CAFO inspections. They should all be reported with EPA as the lead agency.

I will correct the *Joint Lead Flag* in ICIS to show E (federal) for each of these inspections. The updates will be completed this week.

Please don't hesitate to contact me if there are any other Region 9 data questions/issues.

Thank you!

From: Sprague, David

Sent: Wednesday, April 02, 2014 10:52 AM

To: Baranco, Angela

Subject: FW: Question regarding CAFO inspections reports

Angela,

Please see my email below.

Does it make sense for CAFO joint inspections, where the state has the lead (according to the "Joint Lead Flag"), to be flagged as "U.S. EPA" according to the "Agency Type Desc" field?

These are shown in the print screen below.

Since the state has the lead for these, shouldn't the agency type also be "State"?

Region: 09 State: CA

				Cat									
									WW - CAFO Regional				
2800033645	CAU001088	DEBERNARDI DAIRY	6/21/2011	COM	Evaluation	U.S. EPA	3	S	Initiative Areas	CWACAFO	UFT		
2800033652	CAA688118	MCCLELLAND DAIRY	6/21/2811	COM	Evaluation	U.S. EPA	j	S	WW - CAFO Regional Initiative Areas	CWACAFO	UFT		
7888833857	C0.0688113	DIAMONO W DAIRY	5/21/2011	COM	Evaluation	U.S. EPA	1	8	WW - CAFO Regional Initiative Areas	CWACAFO	31F3		
		RENATI DAIRY	6/21/2011	CON	Evaluation	U.S. EPA	1	S	WW - CAFO Regional Initiative Areas	CWACAFO			
		BUCHER DAIRY		COM	Evaluation	U.S. EPA		S	WW - CAFO Regional Initiative Areas	CWACAFO		NON	
2600033671	CAF001430	ALEXANDRE ACRES	6/23/2011	COM	Evaluation	U.S. EPA	j	S	WW - CAFO Regional Initiative Areas	CWACAFO	GPC	NON	
2600033672	CAF801431	SEA MIST ORGANICS	6/23/2811	COM	Evaluation	U.S. EPA	j	S	WW - CAFO Regional Initiative Areas	CWACAFO	GPC	NON	
2600033675	CAF001432	ALEXANDRE ECO DAIRY	8/23/2011	COM	Evaluation	U.S. EPA	j	S	WW - CAFO Regional Initiative Areas	CWACAFO	GPC	NON	
2600033678	CAF001433	ALEXANDRE DAIRY	8/24/2011	COM	Evaluation	U.S. EPA	J	S	WW - CAFO Regional Initiative Areas	CWACAFO	GPC	NON	
2600033706	CAF901428	WALTER STORMETTA RANCH	6/22/2011	COM	Evaluation	U.S. EPA	j	S	WW - CAFO Regional Initiative Areas	CWACAFO	GPC	NON	
2800078895	CAU001097	MORETTI FAMILY DAIRY	11/18/2011	COM	Evaluation	U.S. EPA	j	S	WW - CAFO Regional Initiative Areas	CWACAFO	UFT		
2600076906	CAU001098	STEVE PERUCCHI DAIRY	11/17/2011	COM	Evaluation	U.S. EPA	j	S	WW - CAFO Regional Initiative Areas	CWACAFO	UFT		
2600078910	CAU001099	WKE MELLO DARY	11/17/2011	COM	Evaluation	U.S. EPA	J	S	WW - CAFO Regional Initiative Areas	CWACAFO	UFT		
<b>260007892</b> 3	CAU001100	ALBERT MELLO DAIRY	11/17/2011	COM	Evaluation	U.S. EPA	j	S	WW - CAFO Regional Initiative Areas	CWACAFO	UFT		
2800078930	CAU000180	BUTTKE DIARY	11/17/2011	COM	Evaluation	U.S. EPA	j	S	WW - CAFO Regional Initiative Areas	CWACAFO	UFT		

Thanks, Dave

David Sprague ICIS Customer Support Section From: Sprague, David

Sent: Wednesday, April 02, 2014 11:50 AM

To: Chavez, Kimberly

Cc: Ager, Sara; Klaus, Dan; Grove, Jim

Subject: RE: Question regarding CAFO inspections reports

### Kimberly,

The "Total # of CAFO Joint Inspections" report keys off of CAFO inspections that have a "J" in the "State, Fed or Joint Insp?" field. These can be State or EPA led joint inspections.

The "Total # Wet Weather Inspections" report counts and displays CAFO inspections that are federal according to the "Agency Type Desc" field (e.g., "U.S. EPA" or "EPA Contractor").

I ran both reports for region 9 for FY 11 – FY 13.

According to the "Total # Wet Weather Inspections" report there were 72 region 9 CAFO inspections during that timeframe.

According to the "Total # of CAFO Joint Inspections" report there were 71 region 9 CAFO joint inspections during that timeframe.

These 71 region 9 CAFO joint inspections are <u>all</u> on the "Total # Wet Weather Inspections" report.

The only additional inspection on the "Total # Wet Weather Inspections" report is shown in the first print screen below. This inspection at Falloncrest Farms is not a joint inspection.

# Observations:

- 1. All but one of region 9's federal CAFO inspections from FY 11 FY 13 are also joint inspections.
- 2. All of region 9's CAFO joint inspections from FY 11 FY 13 are also federal inspections (according to the "Agency Type Desc" field).
  - This seems odd to me. I would think the joint inspections, where the state has the lead (according to the "Joint Lead Flag") (see the second print screen below) would also be flagged as <u>state</u> inspections in the "Agency Type Desc" field.
    - → if they were entered that way, these state led CAFO joint inspection inspections would <u>not</u> show up on the "Total # Wet Weather Inspections" report. But, since these are entered with "U.S. EPA" as the agency type they are showing up on the "Total # Wet Weather Inspections" report.

I CC'd Jim Grove on this email in case he can shed some light.

### Priority: WW - CAFO Regional Initiative Areas

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Region: 09

State: CA

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2600033645	CAU001086	DEBERNARDI DAIRY	8/21/2011	CON	Evaluation		U.S. EPA	3	S	Initiative Areas	CWACAFO	UFT		
2800033652	CAA889118	MCCLELLAND DAIRY	6/21/2011	COM	Evaluation		U.S. EPA	j	S	WW - CAFO Regional Initiative Areas	CWACAFO	UFT		
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2600033668	CAF001427	BUCHER DAIRY	6/22/2011	CON	Evaluation		U.S. EPA	j	S	Initiative Areas	CWACAFO	GPC	NON	
2600033871	CAF001430	ALEXANDRE ACRES	8/23/2011	COM	Evaluation		U.S. EPA	j	S	WW - CAFO Regional Initiative Areas	CWACAFO	GPC	NON	
2800033672	CAF801431	SEA MIST ORGANICS	6/23/2011	COM	Evaluation		U.S. EPA	J	S	WW - CAFO Regional Initiative Areas	CWACAFO	GPC	NON	
2800033875	CAF001432	ALEXANDRE ECO DAIRY	8/23/2011	COM	Evaluation		U.S. EPA	j	S	WW - CAFO Regional Initiative Areas	CWACAFO	GPC	NON	
2800033678	CAF001433	ALEXANDRE DAIRY	5/24/2011	COM	Evaluation		U.S. EPA	j	S	WW - CAFO Regional Initiative Areas	CWACAFO	GPC	NON	
2800033708	CAF961428	WALTER STORNETTA RANCH	8/22/2011	COM	Evaluation		U.S. EPA	j	8	WW - CAFO Regional Initiative Areas	CWACAFO	GPC	NON	
2500078895	CAU001097	WORETTI FAMILY DAIRY	11/16/2011	COM	Evaluation		U.S. EPA	J	S	WW - CAFO Regional Initiative Areas	CWACAFO	UFT		
2600076906	CAU001098	STEVE PERUCCHI DAIRY	11/17/2011	COM	Evaluation		U.S. EPA	j	S	WW - CAFO Regional Initiative Areas	CWACAFO	UFT		
2600078910	CAU001099	MKE MELLO DARY	11/17/2011	COM	Evaluation		U.S. EPA	J	S	WW - CAFO Regional Initiative Areas	CWACAFO	UFT		
2880078923	CAU001100	ALBERT MELLO DAIRY	11/17/2011	COM	Evaluation		U.S. EPA	j	S	WW - CAFO Regional Initiative Areas	CWACAFO	UFT		
2600076930	CAU000180	BUTTKE DIARY	11/17/2011	COM	Evaluation		U.S. EPA	J	S	WW - CAFO Regional Initiative Areas	CWACAFO	UFT		

David Sprague

**ICIS Customer Support Section** 

Sprague.David@epa.gov, 202-564-4103

From: Chavez, Kimberly

Sent: Tuesday, April 01, 2014 10:03 AM

To: Sprague, David

Subject: Question regarding CAFO inspections reports

Good Morning David,

I have a quick question regarding the ICIS "Total # of CAFO Joint Inspections" report and the ICIS "Total # Wet Weather Inspections" report. When running both of them and comparing CAFO inspections for R9 from FY11-13, the total inspections reflected by each report where nearly identical. So...I wanted to ask whether these reports are actually meant to be counted separately or does one report include the totals from the other (e.g. total wet weather includes joint inspections)?

Thanks,

Office of Compliance

Kimberly V. Chavez

Planning, Measures, and Oversight Division

202-564-4298